



EX PARTE ONLY REFILED

October 30, 1998

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OCT 30 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

EX PARTE PRESENTATION

Re: *In the Matter of Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity, or in the Alternative, Various Other Relief, NSD File L-98-121*

Dear Ms. Salas:

On October 28, 1998, Daryll Howard, Georgeann Catalano, Cheryl Peters, and the undersigned representing SBC met with Greg Cooke and Kurt Schroeder, representing the Network Services Division of the Common Carrier Bureau to discuss issues in the above referenced docket.

The SBC representatives presented a series of maps that depict the seven SBC states and those cases where LATA's cross state boundaries. In addition, where LATA's cross state boundaries, the maps show the number of access lines in each state and the number of end offices that would require programming to enable intraLATA interstate presubscription. The SBC representatives stressed that only enabling these end offices for intraLATA interstate pre-subscription would necessitate a duplicate programming effort when enabling intraLATA intrastate presubscription.

Please include this letter in the record of these proceedings in accordance with Section 1.1206(a)(2) of the Commission's Rules.

Acknowledgment and date of receipt of this transmittal are requested. A duplicate transmittal letter is attached for that purpose.

Please contact the undersigned should you have any questions.

Respectfully submitted.

A handwritten signature in cursive script, appearing to read "Lincoln E. Brown".  
Attachments

## **IMPLEMENTATION PLANS:**

- **FULL TWO-PIC METHODOLOGY NOT CONSISTENT WITH INTERSTATE INTRALATA IMPLEMENTATION**

Cc: Greg Cooke  
Kurt Schroeder

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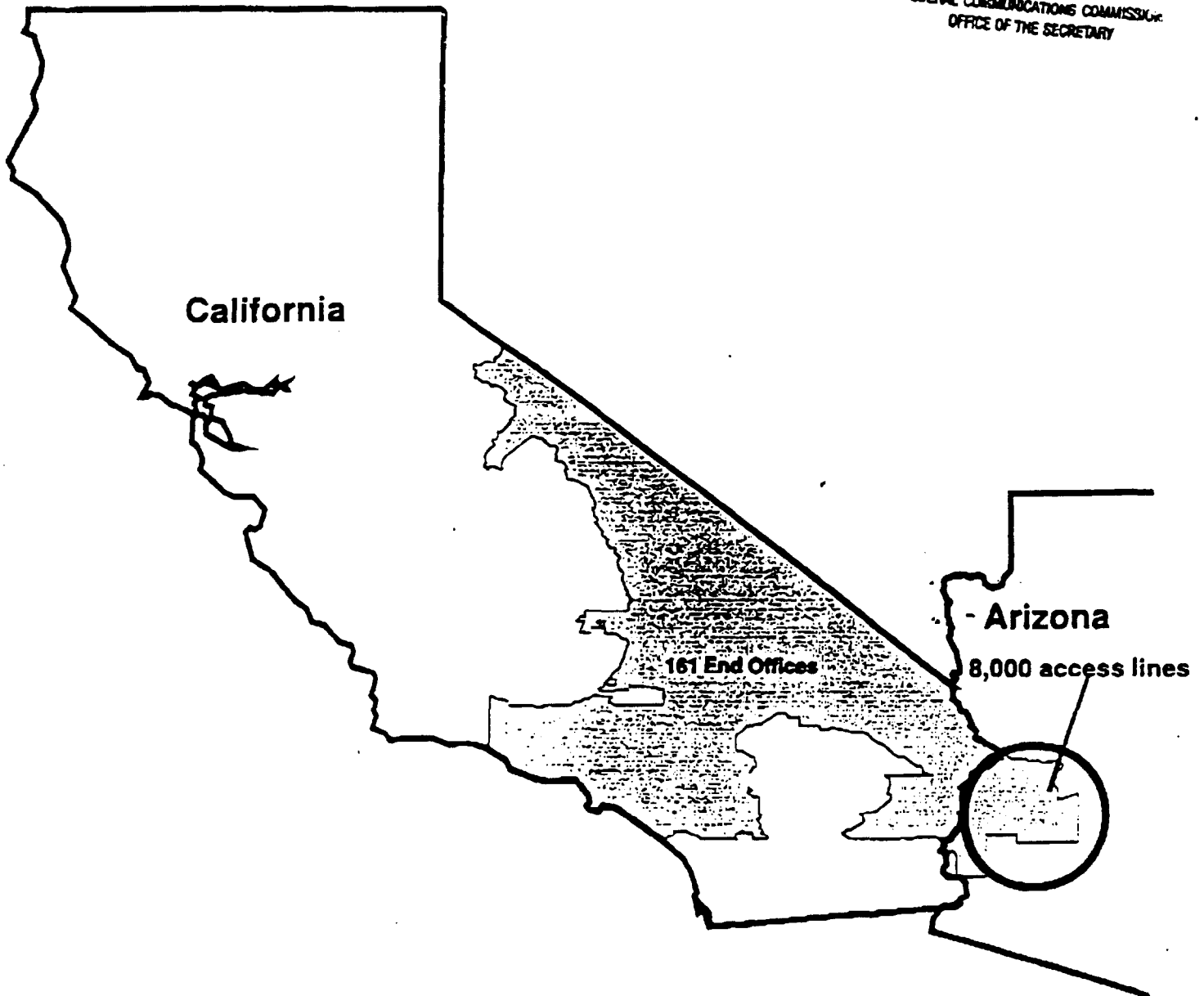
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

# California LATA 730

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OFFICE OF THE SECRETARY



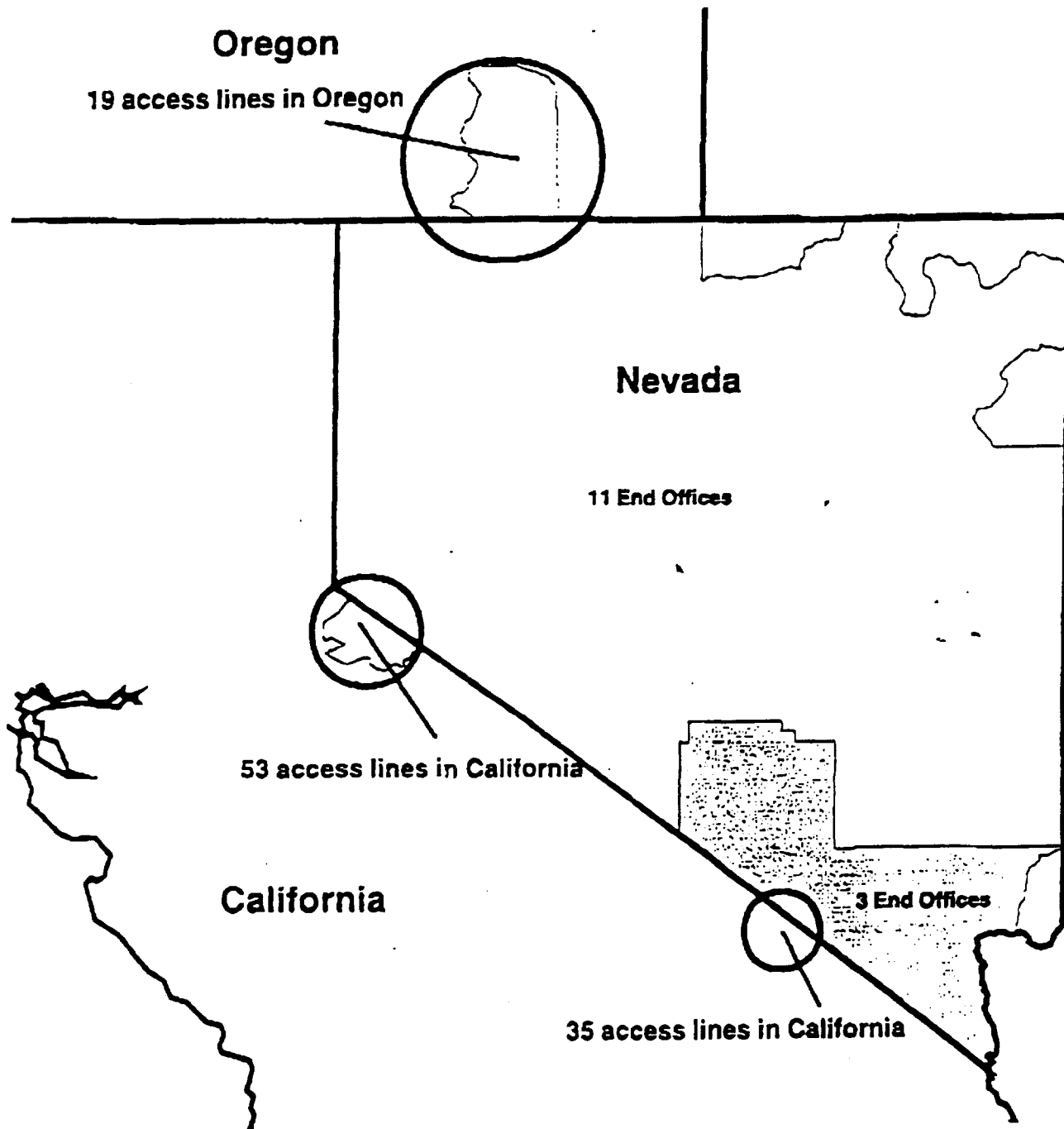
State Boundary






Los Angeles LATA with 6,462,000 Access Lines

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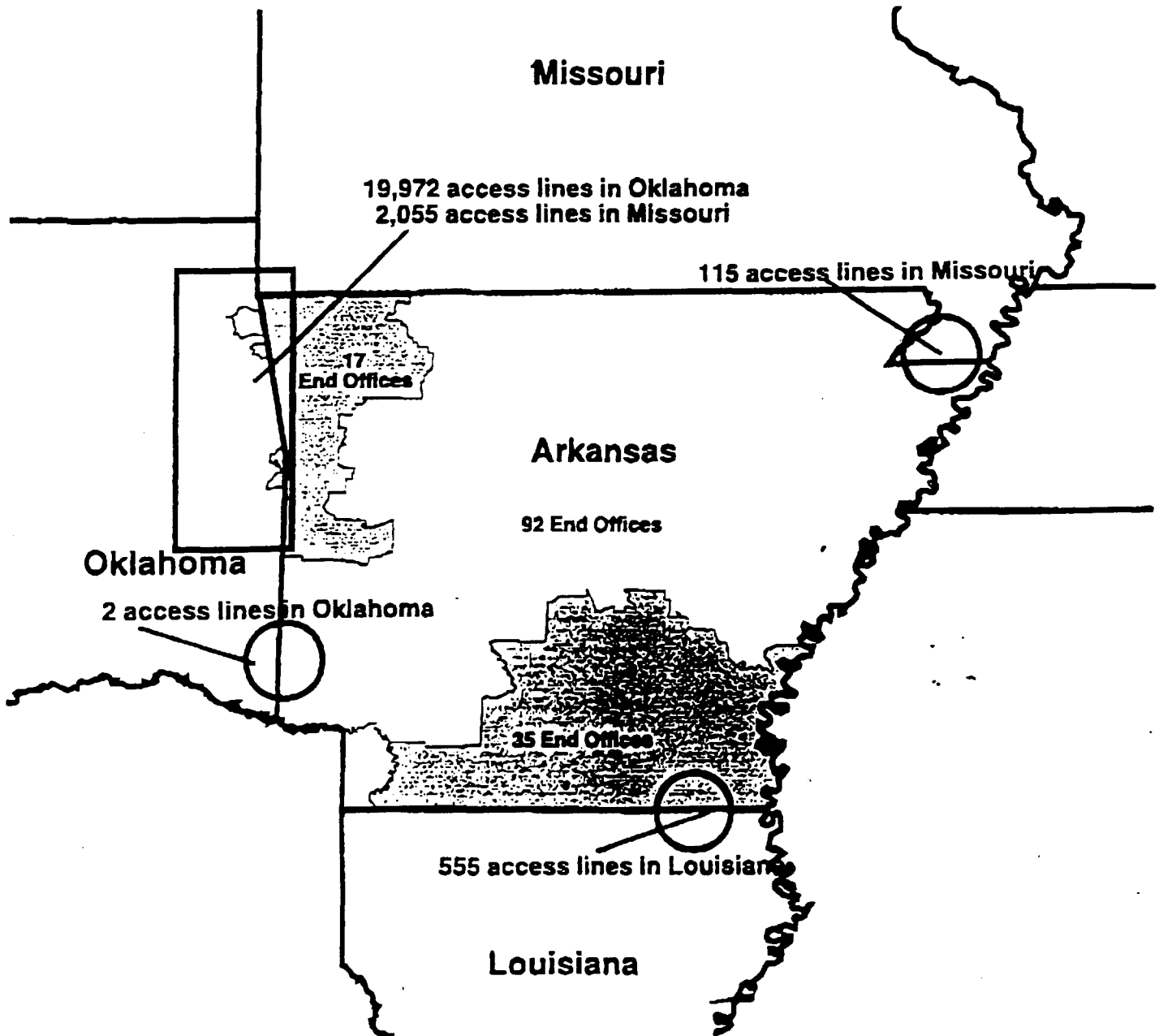
# Nevada LATAs 720, 721







-  State Boundary
-  Pahrump LATA with 17,000 Access Lines
-  Reno LATA with 321,000 Access Lines

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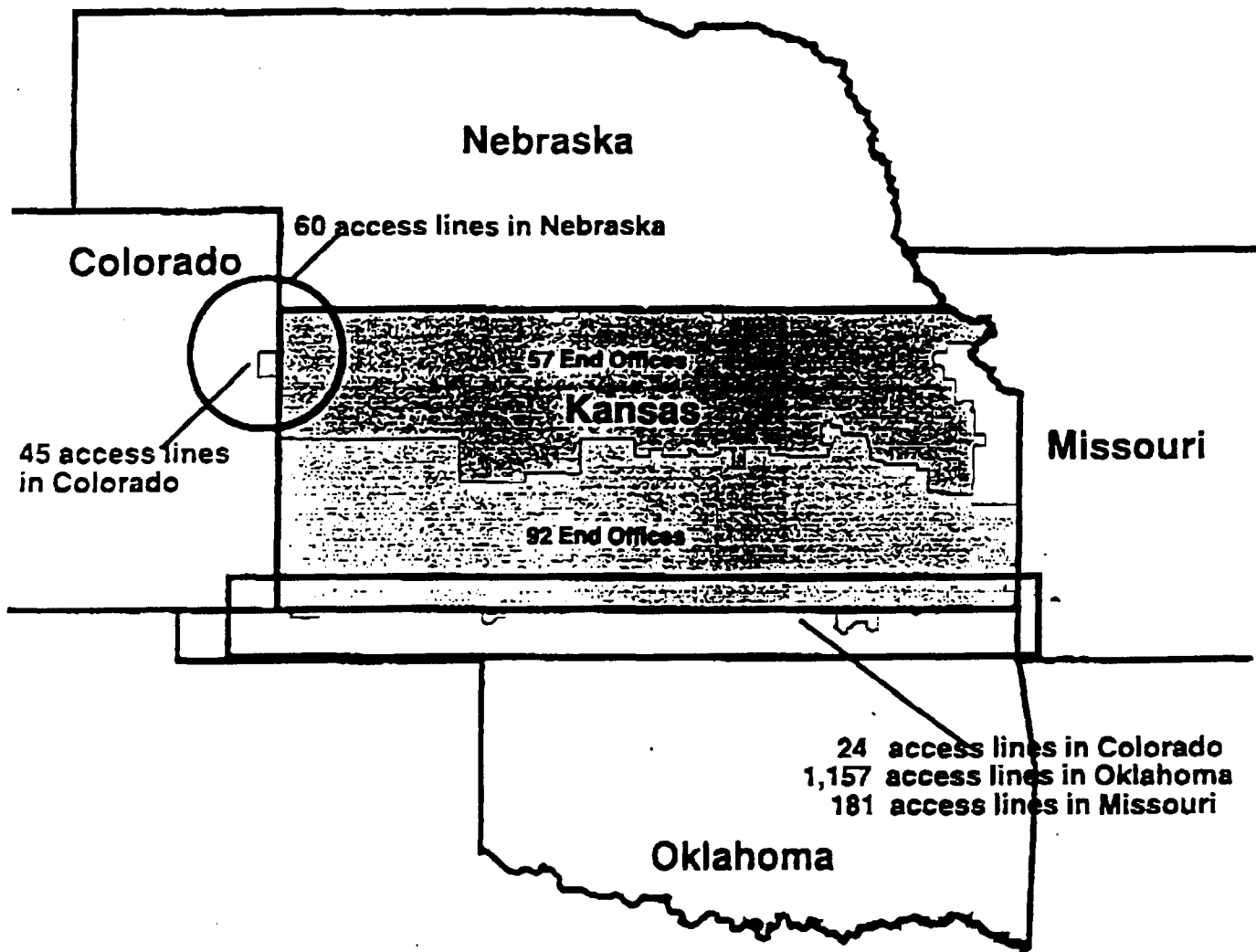
# Arkansas LATAs 526, 528, 530,






-  State Boundary
-  Fort Smith LATA with 209,985 Access Lines
-  Little Rock LATA with 635,204 Access Lines
-  Pine Bluff LATA with 122,284 Access Lines

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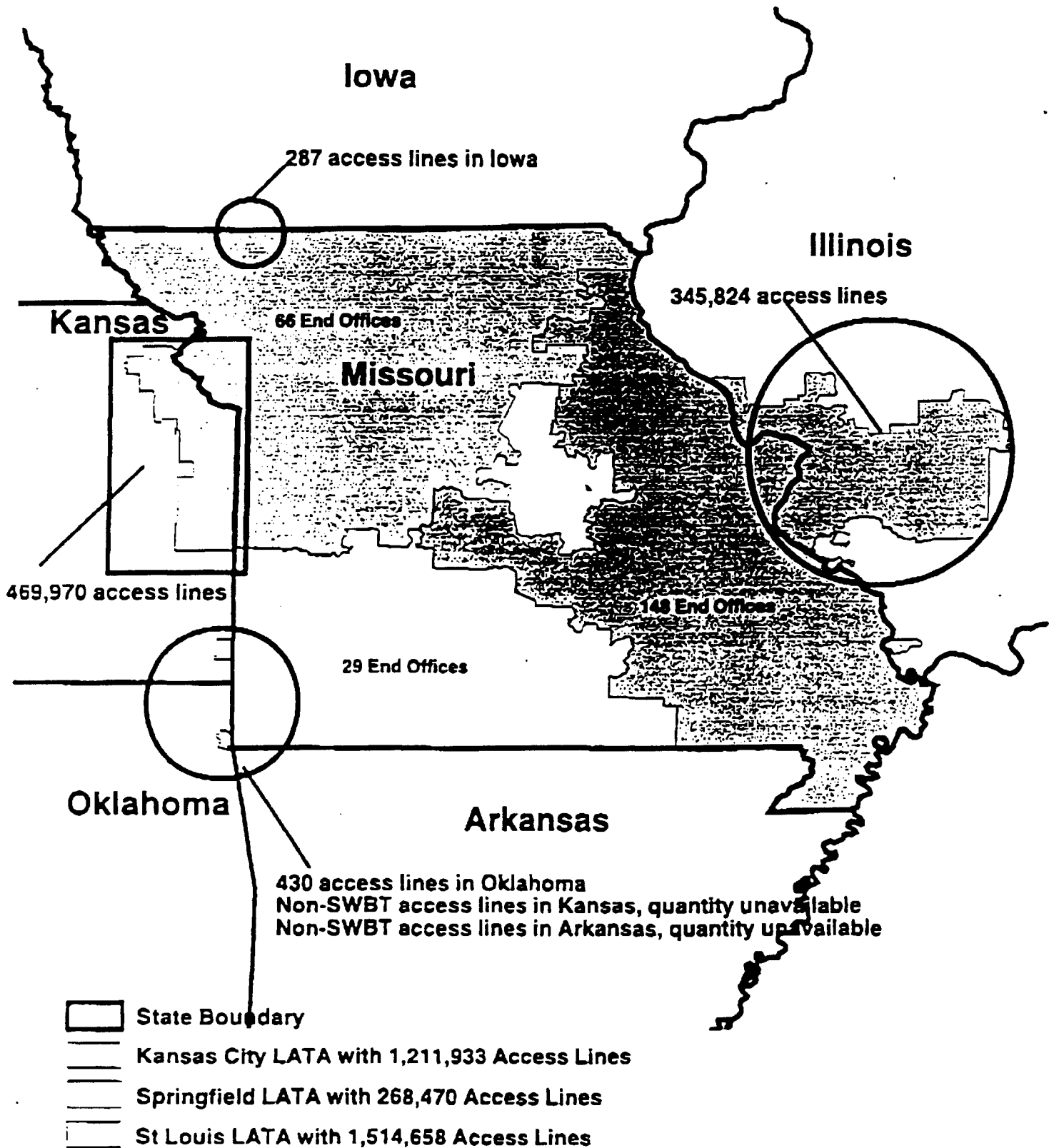
# Kansas LATAs 532, 534



-  State Boundary
-  Wichita LATA with 583,155 Access Lines
-  Topeka LATA with 330,633 Access Lines

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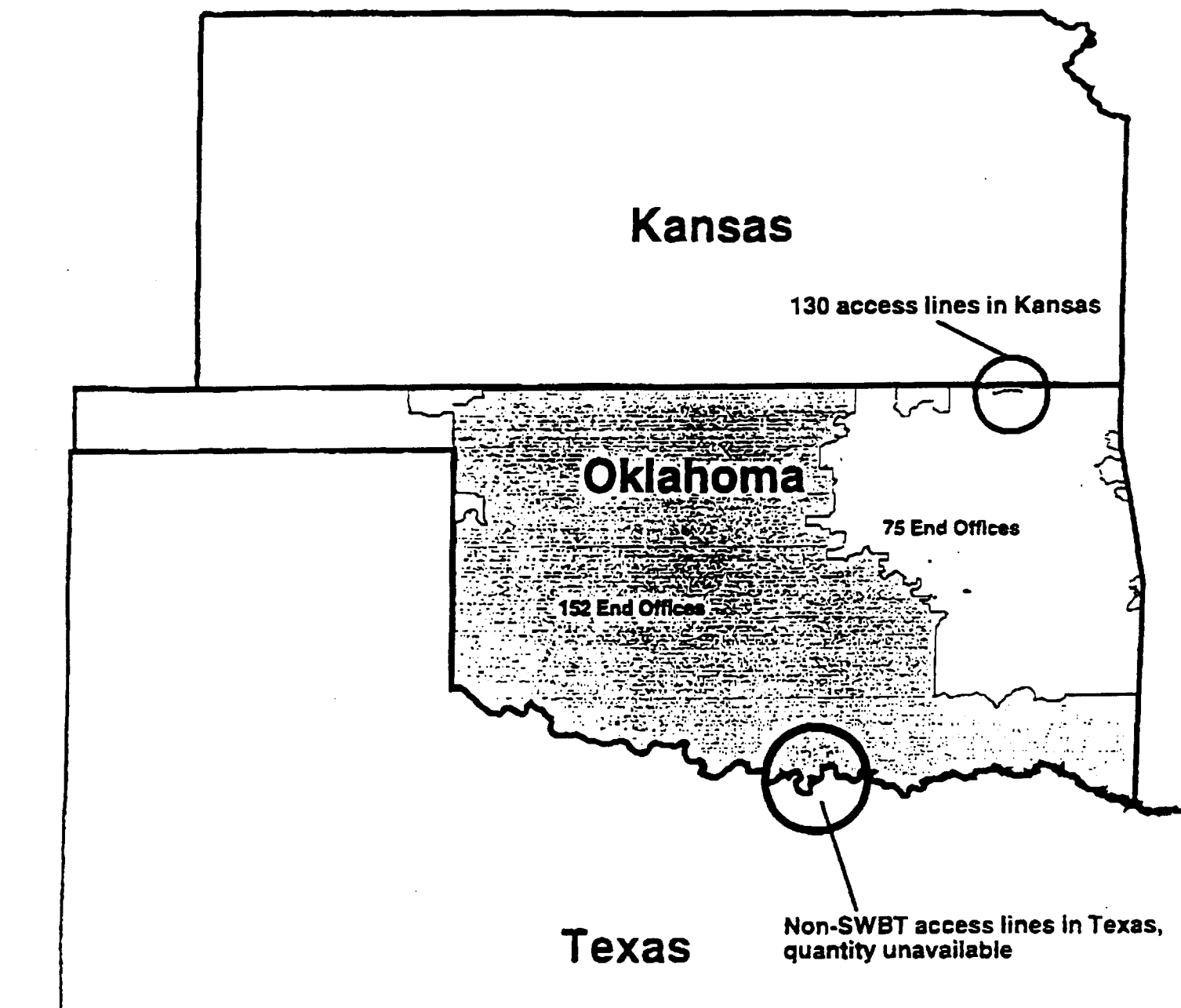
# Missouri LATAs 522, 520, 524






This document was produced by Southwestern Bell Telephone Company on 10/22/96 based on the best information it could from other sources at that time. In addition, it is Southwestern Bell's understanding that the data underlying the creation of this document may be subject to change. Southwestern Bell makes no representation as to the accuracy of the information provided to it and used to create this document.



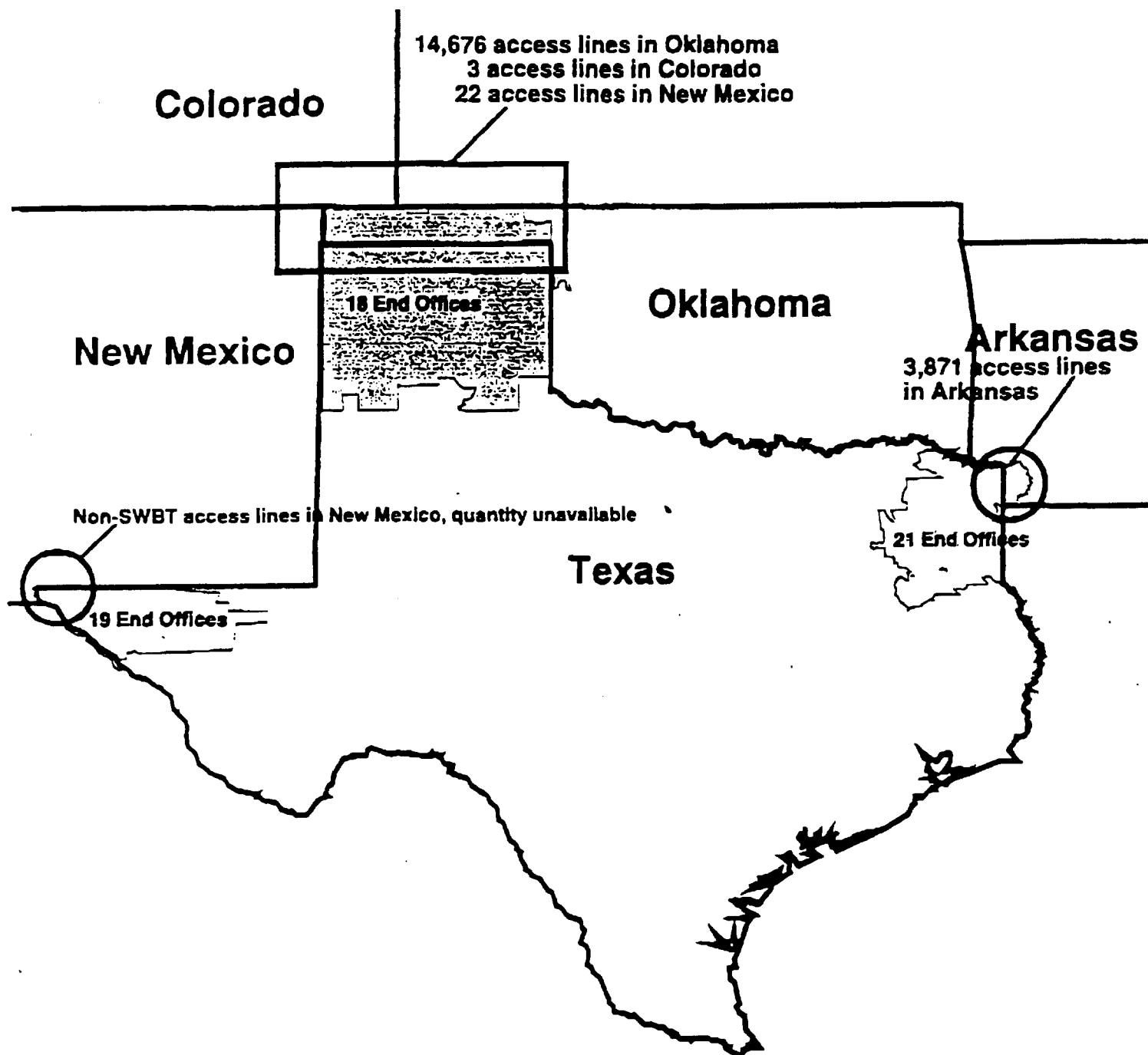
# Oklahoma LATAs 536, 538







-  State Boundary
-  Oklahoma City LATA with 1,033,487 Access Lines
-  Tulsa LATA with 614,845 Access Lines

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# Texas LATAs 540, 546, 554



-  State Boundary
-  Amarillo LATA with 173,321 Access Lines
-  Longview LATA with 235,130 Access Lines
-  El Paso LATA with 317,497 Access Lines

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# SUMMARY OF LINES OUTSIDE OF PRIMARY STATE

LATA Name	# of lines in LATA	# of lines outside primary state	% of lines outside primary state
OKC	1,033,487	-	0.00%
El Paso	317,497	0	0.00%
Little Rock	635,204	117	0.02%
Tulsa	614,845	130	0.02%
Reno	321,000	72	0.02%
Topeka	330,633	105	0.03%
Los Angeles	6,462,000	8,000	0.12%
Springfield	268,470	430	0.16%
Pehrump	17,000	35	0.21%
Wichita	583,155	1,362	0.23%
Pine Bluff	122,284	555	0.45%
Longview	235,130	3,871	1.65%
Amarillo	173,321	14,701	8.48%
Ft. Smith	209,985	22,027	10.49%
St. Louis	1,514,658	345,824	22.83%
Kansas City	1,211,933	469,970	38.78%

NOTE: # of lines outside primary state in OKC and El Paso LATAs is unknown

SOUTHWESTERN BELL, PACIFIC BELL AND  
NEVADA BELL INTERSTATE INTRALATA  
PRESUBSCRIPTION (IILP)

**The SBC LECs' interstate intraLATA  
toll traffic is extremely small**

•SBC LECs' Overall Interstate IntraLATA  
Circumstances

SOUTHWESTERN BELL, PACIFIC BELL AND  
NEVADA BELL INTERSTATE INTRALATA  
PRESUBSCRIPTION (IILP)

Pacific Bell Situation is Exceptionally  
Extreme

- 10 LATAs - only 1 LATA w/interstate intraLATA traffic - de minimus
- Negligible effect on competition - outgoing only, calls from CA to remote community in AZ.
- Severe confusion and potential irritation for 6.5M consumers.

SOUTHWESTERN BELL, PACIFIC BELL AND  
NEVADA BELL INTERSTATE INTRALATA  
PRESUBSCRIPTION (IILP)

**The SBC LECs' interstate intraLATA  
toll traffic is extremely small**

• Nevada Bell's Situation Clearly Warrants a  
Waiver

- “Tiny Bubbles”
- Confusing - share NPA/NXX with California  
customers

SOUTHWESTERN BELL, PACIFIC BELL AND  
NEVADA BELL INTERSTATE INTRALATA  
PRESUBSCRIPTION (IILP)

**The SBC LECs' interstate intraLATA  
toll traffic is extremely small.**

**•SWB Situation**

SOUTHWESTERN BELL, PACIFIC BELL AND  
NEVADA BELL INTERSTATE INTRALATA  
PRESUBSCRIPTION (IILP)

**The work efforts to implement  
interstate intraLATA dialing parity on  
2/8/99 are unreasonably burdensome**



SOUTHWESTERN BELL, PACIFIC BELL AND  
NEVADA BELL INTERSTATE INTRALATA  
PRESUBSCRIPTION (IILP)

**Incremental Interstate  
Implementation Costs are  
Burdensome (\$8-10M)**

SOUTHWESTERN BELL, PACIFIC BELL AND  
NEVADA BELL INTERSTATE INTRALATA  
PRESUBSCRIPTION (IILP)

**Implementing Interstate Only Dialing  
Parity Raises Profound Concerns**

SOUTHWESTERN BELL, PACIFIC BELL AND  
NEVADA BELL INTERSTATE INTRALATA  
PRESUBSCRIPTION (IILP)

**Summary and Recommendation:**  
**The Commission Should Grant the  
SBC LEC's position**



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DEC 22 1998

December 22, 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

EX PARTE OR LATE FILED

EX PARTE PRESENTATION

Re: *In the Matter of Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity, or in the Alternative, Various Other Relief, NSD File L-98-121*

Dear Ms. Salas:

In the above referenced petition, Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell (hereinafter referred to as the SBC LEC's) requested a waiver of the February 8, 1999 implementation date for intraLATA interstate toll dialing parity. The SBC LEC's requested a waiver whereby the date for intraLATA interstate dialing parity would be extended to coincide with the date each individual state requires intraLATA intrastate dialing parity.

The SBC LEC's hereby propose an alternative intraLATA interstate dialing parity implementation timetable. The SBC LEC's will accept as resolution to the above referenced petition the following:

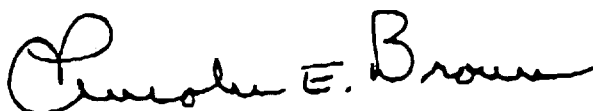
- The SBC LEC's will implement intraLATA interstate dialing parity coincident with intraLATA intrastate dialing parity if a state orders intraLATA intrastate dialing parity prior to March 31, 2000
- If a state has not ordered intraLATA intrastate dialing parity by March 31, 2000, the SBC LEC's will implement intraLATA interstate dialing parity in all of its territories effective March 31, 2000
- If a state has not ordered intraLATA intrastate dialing parity by March 31, 2000, the SBC LEC's will not seek an additional waiver of the intraLATA interstate dialing parity requirement

Please include this letter in the record of these proceedings in accordance with Section 1.1206(a)(2) of the Commission's Rules.

Acknowledgment and date of receipt of this transmittal are requested. A duplicate transmittal letter is attached for that purpose.

Please contact the undersigned should you have any questions.

Respectfully submitted,

A handwritten signature in cursive script, reading "Charles E. Brown". The signature is written in black ink on a white background.

Cc: Yog Varma  
Anna Gomez



Lincoln E. Brown  
Director-Federal Regulatory

SBC Telecommunications, Inc.  
1401 I Street, N.W.  
Suite 1100  
Washington, D.C. 20005  
Phone 202 326-8890  
Fax 202 408-4806

January 19, 1999

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

**EX PARTE PRESENTATION**

Re: *In the Matter of Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity, or in the Alternative, Various Other Relief, NSD File L-98-121*

Dear Ms. Salas:

On December 21, 1998, the undersigned representing SBC met with Yog Varma, Kurt Schroeder, and Robin Smolen to discuss issues in the above referenced docket. At the meeting, SBC proposed an alternative intraLATA interstate dialing parity implementation timetable. The attached Ex Parte letter dated December 22, 1998 contains the details of the proposal.

Please include this letter in the record of these proceedings in accordance with Section 1.1206(a)(2) of the Commission's Rules.

Acknowledgment and date of receipt of this transmittal are requested. A duplicate transmittal letter is attached for that purpose.

Please contact the undersigned should you have any questions.

Respectfully submitted,

A handwritten signature in black ink that reads "Lincoln E. Brown". The signature is written in a cursive, flowing style.

Cc: Yog Varma  
Robin Smolen  
Kurt Schroeder

**BLANK**



December 22, 1998

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

**EX PARTE PRESENTATION**

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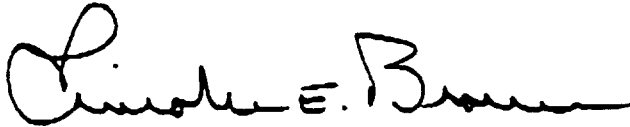


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Please contact the undersigned should you have any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Linda E. Brown". The signature is fluid and cursive, with the first name "Linda" being the most prominent part.

Cc: Yog Varma  
Anna Gomez

WILEY, REIN & FIELDING

1776 K STREET, N.W.  
WASHINGTON, D.C. 20006  
(202) 429-7880

GREGORY J. VOGT  
(202) 719-3240

February 24, 1999

FACSIMILE  
(202) 429-7049  
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Magalie Salas  
Secretary  
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FEB 24 1999

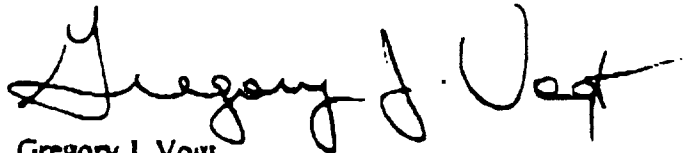
Re: Oral ex parte presentation in Local Competition Proceeding, CC Docket  
No. 96-98

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's rules, an original and one copy of this memorandum summarizing an oral ex parte presentation made by myself on behalf of SBC to Kyle Dixon on February 23, 1999 with respect to the above-captioned proceeding.

SBC asked the Commission to request public comment on the issues surrounding the implementation of intrastate toll dialing parity after the Supreme Court's decision in *Iowa Utilities Board v. AT&T*, although it did not object to suspending the current rule to ensure that states are not found in violation with the previous Commission order. SBC indicated that there were two state statutes and two state settlement agreements that mandated the timing of dialing parity. Comment should be sought on the impact of establishing a federal timetable that preempts those state statutes and decisions. In addition, because the previously established FCC timetable for intrastate toll dialing parity has expired, any new timetable constitutes new rules which, under the APA, can only be adopted after notice and comment procedures, particularly because new facts have occurred that make the old record stale. Finally, a minimum of 120 days is needed for implementation after a state approves a dialing parity plan due to massive reprogramming of software and switches.

Sincerely,



Gregory J. Vogt  
Counsel for SBC Telecommunications, Inc.

cc. Kyle Dixon

WILEY, REIN & FIELDING

1776 K STREET, N.W.  
WASHINGTON, D.C. 20006  
(202) 428-7000

GREGORY J. VOGT  
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February 25, 1999

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Magalie Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

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FEB 25 1999

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~~OFFICE OF THE SECRETARY~~

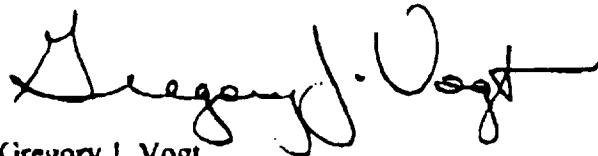
Re: Oral ex parte presentation in Local Competition Proceeding, CC Docket  
No. 96-98

Dear Ms. Salas:

Pursuant to Section 1.1206 of the Commission's rules, an original and one copy of this memorandum summarizing an oral ex parte presentation made by myself on behalf of SBC to Linda Kinney of the Office of Commissioner Susan Ness on February 24, 1999 with respect to the above-captioned proceeding.

SBC asked the Commission to request public comment on the issues surrounding the implementation of intrastate toll dialing parity after the Supreme Court's decision in *Iowa Utilities Board v. AT&T*, although SBC does not object to suspending the current rule to ensure that states are not found in violation with the previous Commission order. SBC indicated that there were two state statutes and two state settlement agreements that mandated the timing of dialing parity. Comment should be sought on the legality and impact of establishing a federal timetable that preempts those state statutes and decisions. In addition, because the previously established FCC timetable for intrastate toll dialing parity has expired, any new timetable constitutes new rules which, under the APA, can only be adopted after notice and comment procedures, particularly because new facts have occurred that make the old record stale. Finally, a minimum of 120 days is needed for implementation after a state approves a dialing parity plan due to massive reprogramming of software and switches.

Sincerely,



Gregory J. Vogt  
Counsel for SBC Telecommunications, Inc.

cc: Linda Kinney